

# THE BERKMAN LAW OFFICE, LLC

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March 9, 2016

Clerk's Office  
United States District Court for the District of Massachusetts  
One Courthouse Way – Suite 2300  
Boston, Massachusetts 02210  
Attn: Clary Geraldino-Karasek, Docket Clerk

Re: *Lelchook, et al. v. Islamic Republic of Iran, et al.*  
Docket no. 15-13715 (PBS)

Dear Ms. Karasek:

We represent the plaintiffs in the above-captioned matter. I write to request that the Clerk effect service pursuant to 28 U.S.C. § 1608(a)(4) on Defendant The Islamic Republic of Iran ("Iran"). Iran is a "foreign state" for the purposes of 28 U.S.C. § 1608(a)(4).

We previously requested service of these documents via DHL pursuant to 28 U.S.C. § 1608(a)(3). However, DHL informed my colleague, Dina Rovner, that the shipments to Iran could not be delivered. Because service was not effected within thirty (30) days under 28 U.S.C. § 1608(a)(3), I now request that the Clerk dispatch the alternative means of service provided for under 28 U.S.C. § 1608(a)(4), which applies when "service cannot be made within 30 days" under § 1608(a)(3).

Accordingly, please find enclosed a check in the amount of \$ 2275.00 as per the service fee, and a copy of the ECF Notice of Electronic Filing of this letter and one set of documents collated and ready for service on Iran, which contains:

- 1) Two copies of the summons in this action addressed to a particular defendant with a translation thereof into Farsi.
- 2) Two copies of the Complaint in this action together with a translation thereof into Farsi
- 3) Two copies of the Consent to Magistrate Judge Forms with a translation thereof into Farsi.
- 4) Two copies of the Notice of Suit together with a translation thereof into Farsi.
- 5) One copy of the FSIA.

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Please take the necessary steps to dispatch these materials and cover letter to the Director, Special Consular Services, U.S. Department of State, CA/OCS/L, SA-17, 10<sup>th</sup> Floor, Washington, DC 20522-1710, in the enclosed pre-addressed and pre-paid U.S. mail package (requesting return receipt) pursuant to 28 U.S.C. § 1608(a)(4).

Once dispatched, kindly have the appropriate docket entry made.

Thank you for your consideration.

Respectfully yours,

  
Robert J. Tolchin